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 12 *Attorneys for Defendant Discover*  
 13 *Financial Services, LLC*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 NATHALIE SANTOS, an individual,

17 Case No.: 2:20-cv-02053-JCM-VCF

18 Plaintiff,

19 vs.

20 DISCOVER FINANCIAL SERVICES  
 21 LLC, a foreign limited-liability company;  
 22 EQUIFAX INFORMATION SERVICES,  
 23 LLC, a foreign limited-liability company;  
 24 EXPERIAN INFORMATION  
 25 SOLUTIONS, INC., a foreign corporation,

26 Defendant.

27  
**DISCOVER FINANCIAL  
 28 SERVICES, LLC'S UNOPPOSED  
 MOTION TO EXTEND  
 DEADLINE TO RESPOND TO  
 COMPLAINT  
 (SECOND REQUEST)**

29 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Discover Financial Services,  
 30 LLC (“Discover”), through its attorneys, respectfully requests that the Court extend the  
 31 deadline in which Discover has to answer or otherwise respond to Plaintiff’s Complaint, by  
 32 fourteen (14) days, through and until February 8, 2021. In support of its Motion, Discover  
 33 states as follows:

34 1. Plaintiff’s Complaint was filed on November 6, 2020. ECF No. 1.

35 2. After executing a waiver of service, Discover’s deadline to respond to the  
 36 Plaintiff’s Complaint was January 11, 2021.

37 3. Discover previously moved to extend its deadline by 14 days, through  
 38 January 25, 2021 (“First Request”), which was granted by the Court. ECF No. 16.

1       4.      Discover now respectfully requests that the Court extend Discover's deadline  
2 to respond to the Complaint by 14 days through and including February 8, 2021 ("Second  
3 Request").

4       5.     Discover's Second Request is brought in good faith and not made to  
5 unnecessarily delay discovery or the proceedings in this matter. The parties anticipate a  
6 resolution of this matter and seek additional time to further gather and review information  
7 and finalize documentation.

8       6.     No party will be prejudiced by the Second Request nor, respectfully, will the  
9 extension unduly burden the Court.

10 7. Counsel for Discover sought concurrence to this Motion from counsel for  
11 Plaintiff and concurrence was obtained to extend the deadline to February 8, 2021. Counsel  
12 for Plaintiff has agreed to extend the response deadline by fourteen (14) days.

13       **WHEREFORE** defendant Discover respectfully requests that the Court grant its  
14 Unopposed Motion to Extend Deadline to Respond to Complaint (Second Request),  
15 extending its deadline to answer or otherwise respond to Plaintiff's Complaint through and  
16 until February 8, 2021, and award such other relief the Court deems just and proper.

17 DATED this 22<sup>nd</sup> day of January, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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Services, LLC*

## ORDER

## IT IS SO ORDERED

*Carl Gaddis*

United States Magistrate Judge

1-25-2021

Dated:

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of January, 2021, I caused a true and accurate copy of the foregoing document entitled *Discover Financial Services, LLC's Unopposed Motion to Extend Deadline to Respond to Complaint* to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ *Annette Jaramillo*  
An employee of Lewis Roca  
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